



# APCO International

*Association Of Public-Safety Communications Officials-International, Inc.*

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May 18, 2007

**APCO INTERNATIONAL**

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Ms. Marlene Dortch

Secretary

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RE: Docket 94-102

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Dear Ms. Dortch:

This is to inform the Commission that APCO International President Wanda McCarley and the undersigned met with Commissioner Michael Copps and Public Safety & Homeland Security Bureau Chief Derek Poarch on May 18, 2007, to discuss APCO's pending Request for Declaratory Ruling in this proceeding. We reiterated our view that location accuracy under the Commission's wireless E9-1-1 rules should be measured at the PSAP level.

We also indicated in the meetings that, if the Commission determines that it must address this issue through a notice of proposed rulemaking, the proceeding should be conducted in an expedited fashion. A final decision defining PSAP service area as the relevant area of measurement for wireless E9-1-1 accuracy should be adopted quickly, and well in advance of other E9-1-1 issues that require more extended consideration. Specifically, on the PSAP-level accuracy question, we recommend a very brief comment period (e.g., 14 days for comments and 7 days for replies) and a rapid Commission order on that issue (e.g., within 21 days). We have no specific recommendation at this time regarding an appropriate comment period for the other issues to be considered.

Please contact the undersigned should the Commission require any additional information regarding this matter.

Respectfully submitted,

Robert M. Gurss

Director of Legal and Government Affairs

cc: Bruce Gottlieb  
Derek Poarch